

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAMMI MARIE PALMER,

Defendant.

INDICTMENT

(18 U.S.C. § 641)

(18 U.S.C. § 981(a)(1)(C))

(28 U.S.C. § 2461(c))

(42 U.S.C. § 1383a(a)(2))

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Theft of Public Money)

From in or about June 2003 to in or about January 2009, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did willfully and knowingly steal, purloin and convert to her own use money of the Social Security Administration, a department or agency of the United States, namely, Supplemental Security Income benefits to which she well knew she was not entitled, having a value of approximately \$45,814.45; all in violation of Title 18, United States Code, Section 641.

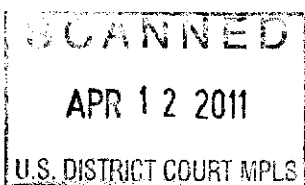
COUNT 2

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about January 31, 2008, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social



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JUDGMENT ENTERED \_\_\_\_\_  
DEPUTY CLERK'S INITIALS \_\_\_\_\_

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Security Administration in determining rights to Supplemental Security Income payments. Specifically, when providing redetermination information to support minor B.M.P.'s continuing eligibility for Supplemental Security Income payments, defendant Palmer falsely stated that her household consisted of herself and minors B.M.P., D.D.P. and J.P. In truth and in fact, as defendant Palmer well knew, her husband was also living in the household and receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**COUNT 3**

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about January 31, 2008, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social Security Administration in determining rights to Supplemental Security Income payments. Specifically, when providing redetermination information to support minor D.D.P.'s continuing eligibility for Supplemental Security Income payments, defendant Palmer falsely stated that her household consisted of herself and minors B.M.P., D.D.P. and J.P. In truth and in fact, as defendant Palmer well knew, her husband was also living in the household and

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receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**COUNT 4**

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about November 7, 2008, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social Security Administration in determining rights to Supplemental Security Income payments. Specifically, when providing redetermination information to support minor B.M.P.'s continuing eligibility for Supplemental Security Income payments, defendant Palmer falsely stated that her household consisted of herself and minors B.M.P., D.D.P. and J.P. In truth and in fact, as defendant Palmer well knew, her husband was also living in the household and receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**COUNT 5**

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about November 7, 2008, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

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did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social Security Administration in determining rights to Supplemental Security Income payments. Specifically, when providing redetermination information to support minor D.D.P.'s continuing eligibility for Supplemental Security Income payments, defendant Palmer falsely stated that her household consisted of herself and minors B.M.P., D.D.P. and J.P. In truth and in fact, as defendant Palmer well knew, her husband was also living in the household and receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**COUNT 6**

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about March 4, 2009, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social Security Administration in determining rights to Supplemental Security Income payments. Specifically, when completing a Request for Reconsideration (Form SSA-561-U2) on behalf of minor B.M.P., defendant Palmer falsely stated that her husband, Kevin Palmer, did not live in her household. In truth and in fact, as defendant

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Palmer well knew, her husband was living in the household and receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**COUNT 7**

(False Statement for Use in Determining Rights to Social Security Benefit)

On or about March 4, 2009, in the State and District of Minnesota, the defendant,

**TAMMI MARIE PALMER,**

did knowingly and willfully make and cause to be made a false statement and representation of material fact for use by the Social Security Administration in determining rights to Supplemental Security Income payments. Specifically, when completing a Request for Reconsideration (Form SSA-561-U2) on behalf of minor D.D.P., defendant Palmer falsely stated that her husband, Kevin Palmer, did not live in her household. In truth and in fact, as defendant Palmer well knew, her husband was living in the household and receiving wages, as he had been since at least May 2002. All in violation of Title 42, United States Code, Section 1383a(a)(2).

**Forfeiture Allegations**

Count One of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code,

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Section 2461(c).

As the result of the offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 641.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON